

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
LILYANN RYAN, as Administrator of the  
Estate of BARTHOLOMEW RYAN, deceased,  
and LILYANN RYAN, individually,

Plaintiff,

-against-

COUNTY OF NASSAU, COUNTY OF NASSAU  
CORRECTIONAL CENTER, NASSAU COUNTY  
SHERIFF'S DEPARTMENT, ARMOR CORRECTIONAL  
HEALTH SERVICES, INC., and ARMOR  
CORRECTIONAL HEALTH SERVICES OF NEW  
YORK, INC.,

Defendants.  
-----X

**12-CV-5343 (JS)(SIL)**

**DECLARATION OF**  
**JOHN J. DOODY**

John J. Doody, an attorney duly admitted to practice law in the courts of this State and  
this Federal District, being duly sworn, deposes and states:

1. I am a partner with the firm of Lewis Brisbois Bisgaard & Smith LLP, attorneys for  
defendants Armor Correctional Health Services Inc. and Armor Correctional Health Services of  
New York, Inc. (hereinafter the "Armor Defendants"). This affirmation is based on my personal  
knowledge and a review of documents pertaining to this matter. Accordingly, I am fully familiar  
with the facts set forth below.

2. I submit this Declaration in Support of the Armor Defendants' Motion for Summary  
Judgment dismissing all claims against them pursuant to Rule 56 of the Federal Rules of Civil  
Procedure and for such other and further relief as this Court deems just and proper.

3. Armor is a private company that provides medical services for inmates at the Nassau  
County Correctional Center pursuant to a contract with the Nassau County Sheriff's Department

since June 2011 pursuant to a written contract with the Nassau County Sheriff's Department, as approved by the Nassau County Legislature. .

3. Annexed hereto as Exhibits are documents and transcripts of deposition testimony taken in this action and relied upon and cited in the Armor Defendants' Statement of Undisputed Facts Pursuant to Local Civil Rule 56.1 dated January 8, 2015 (annexed hereto as **Exhibit "P"**) and further cited, and relied upon in the annexed Memorandum of Law. These documents which show the adequate, prompt and reasonable medical treatment the Armor Defendants rendered plaintiff-decedent upon his admission to NCCC and are as follows:

1. Annexed hereto as **Exhibit "A"** is a copy of Plaintiff's Complaint dated October 17, 2012.

2. Annexed hereto as **Exhibit "B"** is a copy of Plaintiff's Amended Complaint dated November 14, 2012.

3. Collectively annexed hereto as **Exhibit "C"** are copies of the Answers of Armor Defendants dated December 26, 2012 and a copy of Nassau County's Answer to the Amended Complaint dated December 21, 2012.

4. Collectively annexed hereto as **Exhibit "D"** is a copy of the Deposition Transcript of Lilyann Ryan taken on April 14, 2014 and transcript of the 50-H Hearing of the Plaintiff Lilyann ryan taken on August 16, 2012

5. Annexed hereto as **Exhibit "E"** is a copy of the Deposition Transcript of Thomas Ryan.

6. Annexed hereto as **Exhibit "F"** is a copy of the Deposition Transcript of Correction Officer Michael Archer.

7. Annexed hereto as **Exhibit “G”** is a copy of the Suicide Prevention Screening Form dated February 23, 2012.

8. Annexed hereto as **Exhibit “H”** is a copy of the Deposition Transcript of RN Tanya Tinglin.

9. Annexed hereto as **Exhibit “I”** is a copy of the Health Assessment Form dated February 23, 2012.

10. Annexed hereto as **Exhibit “J”** is a copy of the Deposition Transcript of Dr. Vincent Manetti.

11. Annexed hereto as **Exhibit “K”** is a copy of the Initial Mental Health Assessment Form dated February 24, 2012.

12. Annexed hereto as **Exhibit “L”** is a copy of the Deposition Transcript of Correction Officer Thomas Killeen.

13. Annexed hereto as **Exhibit “M”** is a copy of the Deposition Transcript of Correction Officer Steven Brown.

14. Annexed hereto as **Exhibit “N”** is a copy of the Deposition Transcript of Nurse Natalie McPherson.

15. Annexed hereto as **Exhibit “O”** is a copy of the Armor Mental Health Screening Form dated February 23, 2012.

16. Annexed hereto as **Exhibit “P”** is a copy of the Armor defendants’ Statement of Undisputed Facts.

17. It is respectfully submitted that based on the foregoing documents and for reasons more fully explained in the accompanying memorandum of law, plaintiff is not entitled to the relief requested in the Complaint and Armor defendants are entitled to summary judgment.

Dated: New York, New York  
September 1, 2015

LEWIS BRISBOIS BISGAARD & SMITH, LLP

By:

/s/

John J. Doody (JD-0552)

*Attorneys for Defendants*

*Armor Correctional Health Services of New York,  
Inc. and Armor Correctional Health Services of  
New York, Inc.*

77 Water Street, Suite 2100

New York, New York 10005

(212) 232-1300

[john.doody@lewisbrisbois.com](mailto:john.doody@lewisbrisbois.com)